

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

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21MC102(AKH)

CIRILO ENCALADA (AND WIFE, MELVA ENCALADA,

07CV4465(AKH)

Plaintiff(s),

-against-

100 WALL STREET COMPANY LLC, et al.

Defendants.

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**NOTICE OF ADOPTION BY  
2 BROADWAY LLC OF  
ANSWER TO MASTER  
COMPLAINT**

**PLEASE TAKE NOTICE** that defendant **2 BROADWAY LLC** (hereinafter “2 Broadway”), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts 2 Broadway’s Answer to Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **2 BROADWAY** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**PLEASE TAKE FURTHER NOTICE THAT** defendant, 2 Broadway reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (§ D(1)-(5)).

**WHEREFORE**, 2 Broadway demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
December 5, 2007

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
2 BROADWAY LLC

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/s/  
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**All Counsel via ECF**

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on December 5, 2007, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of 2 Broadway LLC's Adoption of Answer to Master Complaint.

Dated: December 5, 2007

/s/  
Stanley Goos, Esq. (SG 7062)